

JAMES P. C. SILVESTRI, ESQ.  
Nevada Bar No. 3603  
RICHARD WALTJEN, ESQ.  
Nevada Bar No. 13416  
PYATT SILVESTRI  
7670 W. Lake Mead Blvd., Suite 250  
Las Vegas, NV 89128  
Tel: (702) 383-6000  
Fax: (702) 477-0088  
jsilvestri@pyattsilvestri.com  
rwaltjen@pyattsilvestri.com  
Attorneys for Plaintiff,  
*American National Property And Casualty Company*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

AMERICAN NATIONAL PROPERTY AND  
CASUALTY COMPANY,

Plaintiff,

vs.

SHAUN MICHAEL CALEY, an individual;  
P.E.P. as Parent and Guardian ad Litem of  
JANE DOE, a minor; DOES I through X;  
ROES I through X;

Defendants.

Case No.: 2:24-cv-01723-JAD-BNW

**STIPULATION AND ORDER  
EXTENDING TIME TO SUBMIT  
DISCOVERY PLAN AND  
SCHEDULING ORDER  
(Second Request)**

Plaintiff AMERICAN NATIONAL PROPERTY AND CASUALTY COMPANY  
("ANPAC"), Defendant SHAUN MICHAEL CALEY, ("Caley"), and P.E.P. as Parent and  
Guardian ad Litem of JANE DOE ("P.E.P.") (collectively referred to as the "Parties"), by and  
through their respective undersigned counsel of record, hereby stipulate and agree to extend the  
date for submission of the Parties' Discovery Plan and Scheduling Order ("DPSO") for an  
additional sixty (60) days, to March 17, 2025.

On December 17, 2024, the parties agreed to extend the deadline date to submit a  
stipulated DPSO for thirty days, from December 17, 2024, to January 16, 2025, based on a

1 settlement reached between the parties (ECF. No. 19). This Court signed the Order granting the  
 2 extension (ECF No. 20). This Court also denied as moot, and without prejudice, the pending  
 3 Motion to Dismiss and Motion to Stay (ECF Nos. 12 and 13), and allowed the parties to refile  
 4 their Motions, if necessary, by January 26, 2025 (ECF No. 20).

5 The parties need additional time to complete the settlement and dismiss the underlying  
 6 State Case. Specifically, a minor's compromise case still must be submitted and approved.

7 The Parties have therefore agreed to extend the time for submission of the DPSO for  
 8 sixty (60) days, to March 17, 2025, or to file a Stipulation to Dismiss prior to that date. In  
 9 addition, the Parties agree to extend the date to refile the Motion to Dismiss and/or Motion to  
 10 Stay by sixty (60) days, to March 27, 2025.

11 This is the Parties' Second Request for Extension of the deadline to submit a stipulated  
 12 DPSO.  
 13

14 DATED this \_\_\_\_ day of January, 2025.

DATED this \_\_\_\_ day of January, 2025.

15 **PYATT SILVESTRI**

**DRUMMOND LAW FIRM**

16 */s/ Richard Waltjen*

*/s/ Craig W. Drummond*

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JAMES P. C. SILVESTRI, ESQ.

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CRAIG W. DRUMMOND, ESQ.

18 Nevada Bar No. 3603

Nevada Bar No. 11109

19 RICHARD WALTJEN, ESQ.

JOSEPH A. TUTONE, ESQ.

20 Nevada Bar No. 13416

Nevada Bar No. 16333

21 7670 W. Lake Mead Blvd., Suite 250

3325 W. Sahara Ave.

22 Las Vegas, NV 89128

Las Vegas, NV 89102

23 Tel: (702) 383-6000

Ph: 702-366-996

24 Fax: (702) 477-0088

Fx: (702) 508-9440

25 *rwaltjen@pyattsilvestri.com*

*Attorney for P.E.P. as parent and Guardian Ad*

26 *Attorney for Plaintiff,*

*Litem of JANE DOE*

27 *American National Property And Casualty*  
 28 *Company*

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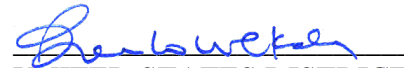
1 DATED this \_\_\_\_ day of January, 2025.

2 **WHITMIRE LAW, PLLC**

3 */s/ James E. Whitmire*

4 James E. Whitmire, Esq.  
5 Nevada Bar No. 6533  
6 10785 West Twain Ave.  
7 Las Vegas NV 89135  
8 Ph: (702) 846-0949  
9 Fx: (702) 727-1343  
10 *Attorney for P.E.P. as parent and Guardian Ad*  
11 *Litem of JANE DOE*

9 **IT IS SO ORDERED:**

10  
11 

12 UNITED STATES DISTRICT  
13 JUDGE/UNITED STATES MAGISTRATE  
14 JUDGE

15 DATED: 1/13/2025